

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 19-03055-01-CR-S-MDH
)	
JASON A. HAMANN,)	
)	
Defendant.)	

DEFENDANT’S REQUEST TO CONTINUE SENTENCING

COMES NOW David K. Back, counsel for Defendant Jason Hamann, and moves this Court to continue the Defendant HAMANN’s sentencing date of February 10, 2021 in order for the Defendant to finalize his sentencing argument and gather all his sentencing exhibits from his support group for the Courts’ review prior to sentencing. In support of this request, Defendant states the following:

1. On December 9, 2020, the Court released its “Notice of Hearing” (ECF #51) setting the Defendant’s sentencing date for February 10, 2021.
2. On December 12, 2020, counsel notified Defendant of said sentencing date through a letter sent in the U.S. Mail, along with the ECF document #51.
3. Since that date, counsel for Defendant has received a number of letters of support and other exhibits on behalf of the Defendant to be included in the Defendant’s Sentencing Memorandum. However, the Defendant has not been able to notify his entire support group including but not limited a longtime paramour, Julie Callihan. Counsel had been communicating with Ms. Callihan through an old office telephone number that no longer exists and counsel had assumed the Defendant was able to notify Ms. Callihan who had moved out of state shortly after

the Defendant's arrest in the present case. Counsel for defendant was able to leave a voice message with Ms. Callihan's last known phone number but more time is needed to establish contact with Ms. Callihan and more time for her to submit sentencing exhibits on behalf of the Defendant.

4. Counsel for the Government, Assistant United States Attorney Jessica Sarff does not have any objection to continuing the Defendant's sentencing hearing.

WHEREFORE, counsel for Defendant Jason Hamann respectfully requests the Court continue his sentencing date so that the Defendant can present all his exhibits and letters of support for the Courts' review prior to his sentencing, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

BY /s/ David K. Back
David K. Back, Attorney for Defendant
Missouri Bar No. 46338
PO BOX 9112
Springfield, Missouri 65801
Telephone: 417-350-1177
davidbacklaw@gmail.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Continuance Request was delivered on 2nd day of February, 2021 to the CM/ECF system of the United States District Court for the Western District for electronic delivery to all counsel of record.

/s/ David K. Back
David K. Back, Attorney for Defendant